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February 29, 2012

**HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO SECOND
PROTECTIVE ORDER IN WC DOCKET NOS. 10-90 AND 05-337 BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION**

REDACTED FOR PUBLIC INSPECTION

BY HAND DELIVERY & ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: *Wireline Competition Bureau Seeks Comment on Potential Data
for Connect America Fund Phase One Incremental Support*, FCC
Public Notice in WC Dockets 10-90 and 05-337, DA 12-137
(Wireline Competition Bur., rel. Feb. 6, 2011) (“*CAF I Wire
Center Public Notice*”);
Second Protective Order in WC Docket Nos. 10-90 and 05-337,
DA 12-192 (Wireline Competition Bur., rel. Feb. 10, 2012)

Dear Ms. Dortch:

Pursuant to the *CAF I Wire Center Public Notice* and *Second Protective Order* cited above, Alaska Communications Systems Group, Inc., on behalf of its four incumbent local exchange carrier subsidiaries (“ACS”), hereby files data for the calculation of the incremental support amounts that will be made available under the Connect America Fund (“CAF”) Phase I mechanism. In this filing, ACS provides wire center data specific to ACS, which ACS believes will be useful to the Bureau in determining which wire centers are eligible for CAF Phase I incremental support, and in calculating the distribution of support among price cap carriers under the Commission’s high-cost proxy model. Two categories of information are provided with this filing:

- First, in paragraph 4 of the *CAF I Wire Center Public Notice*, parties are invited to submit data on a wire center basis for each of the input variables used in the high-cost model; ACS provides herewith the data that is responsive to several of those variables for each ACS wire center. ACS intends to file data that is responsive

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to the remaining variables in a subsequent filing.¹

- Second, ACS reviewed the list of wire centers for price cap carriers published by the Commission as set forth in paragraph 5 of the *CAF I Wire Center Public Notice*; on an attachment hereto, ACS identifies five ACS wire centers that are missing from that list, as well as one wire center that appears erroneously on the list.

Certain of the information filed herewith is proprietary and highly confidential to ACS. If released to competitors or others with whom ACS does business, it could allow those persons to gain a significant advantage in the marketplace or in negotiations. It meets the definition of Highly Confidential Information set forth in the Second Protective Order cited above. Therefore, ACS has marked each page of its Stamped Highly Confidential Documents with the legend required in paragraph 5 of the Second Protective Order, indicating it is Highly Confidential Information, and has indicated that the documents contain such sensitive information that the copying of the Stamped Highly Confidential Documents is restricted, as provided for in paragraph 6 of the Second Protective Order.

ACS is filing herewith one copy of ACS's Stamped Highly Confidential Documents as defined in the Second Protective Order, and two redacted copies. ACS also provides two copies of each Stamped Highly Confidential Document for Katie King. Please direct any questions regarding this matter to me.

Very truly yours,

/s/

Karen Brinkmann

Counsel for Alaska Communications Systems Group, Inc.

cc: Steven Rosenberg, Chief Data Officer, Wireline Competition Bureau
Katie King, Special Counsel, Telecommunications Access Policy Division ("TAPD"), Wireline Competition Bureau
Joseph Cavender, TAPD, Wireline Competition Bureau
Charles Tyler, TAPD, Wireline Competition Bureau

¹ Comments are due by March 19, 2012. See 77 Fed. Reg. 9653 (Feb. 17, 2012). ACS files the attached data at this time to assist the Bureau in meeting its March 31 deadline for announcement of CAF Phase I incremental support amounts for each price cap carrier.